

1 Tanya E. Moore, SBN 206683
2 MOORE LAW FIRM, P.C.
3 300 South First Street, Suite 342
4 San Jose, California 95113
5 Telephone: (408) 298-2000
6 Facsimile: (408) 298-6046
7 Email: service@moorelawfirm.com

8 Attorney for Plaintiff,
9 Cleveland Vickers

10 **UNITED STATES DISTRICT COURT**
11 **EASTERN DISTRICT OF CALIFORNIA**

12 CLEVELAND VICKERS,

13 Plaintiff,

14 vs.

15 DANCE UNLIMITED, LLC dba DANCE
16 UNLIMITED, et al.,

17 Defendants.

No. 2:21-cv-00732-JAM-KJN

**STIPULATION GRANTING PLAINTIFF
LEAVE TO FILE FIRST AMENDED
COMPLAINT; ORDER**

18 **IT IS HEREBY STIPULATED** by and between Plaintiff, Cleveland Vickers
19 (“Plaintiff”), and Defendants, Dance Unlimited, LLC dba Dance Unlimited and Natalia Clarke,
20 Trustee of the Natalia Clarke Family Trust, U/A dated January 27, 2009 (collectively
21 “Defendants,” and together with Plaintiff, the “Parties”), the parties hereto, through their
22 respective attorneys of record, that Plaintiff may file a First Amended Complaint, a copy of
23 which is attached hereto as Exhibit “A.” This amendment will not modify any date or deadline
24 fixed by the Court’s Scheduling Order dated November 30, 2021 (Dkt. 23) pursuant to Fed. R.
25 Civ. P. 16(b)(4), and is not prejudicial to Defendants, the product of undue delay, proposed in
26 bad faith, or futile.

27 **IT IS FURTHER STIPULATED** that Plaintiff will file his First Amended Complaint
28 within five (5) calendar days of the Court’s Order permitting such filing, and that Defendants’

STIPULATION GRANTING PLAINTIFF LEAVE TO FILE FIRST AMENDED COMPLAINT;
ORDER

1 response thereto shall be filed within fourteen (14) days after the First Amended Complaint is
2 filed.

3 **IT IS SO STIPULATED.**

4 Dated: April 7, 2022

MOORE LAW FIRM, P.C.

5
6 /s/ Tanya E. Moore

Tanya E. Moore
Attorney for Plaintiff,
Cleveland Vickers

8
9 Dated: April 7, 2022

VAUGHAN & ASSOCIATES LAW OFFICE, APC

10
11 /s/ Cris V. Vaughan

Cris V. Vaughan
Khushpreet R. Mehton
Attorneys for Defendants,
Dance Unlimited, LLC dba Dance Unlimited and
Natalia Clarke, Trustee of the Natalia Clarke
Family Trust, U/A dated January 27, 2009

12
13
14
15
16 **ORDER**

17 The Parties having so stipulated and good cause appearing,

18 **IT IS HEREBY ORDERED** that Plaintiff shall file his First Amended Complaint, a
19 copy of which was filed with the Parties' stipulation, within five (5) calendar days of the date
20 this Order is filed.

21 **IT IS FURTHER ORDERED** that Defendants' response thereto shall be filed within
22 fourteen (14) days after the First Amended Complaint is filed.

23
24 **IT IS SO ORDERED.**

25
26 Dated: April 8, 2022

/s/ John A. Mendez

27 THE HONORABLE JOHN A. MENDEZ
28 UNITED STATES DISTRICT COURT JUDGE

STIPULATION GRANTING PLAINTIFF LEAVE TO FILE FIRST AMENDED COMPLAINT;
ORDER